

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARK NORTON, DASHKA LOUIS,
CAROLINE MITCHELL, NANCY
BARTLETT and AZILDA CORDAHI,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MASS GENERAL BRIGHAM
INCORPORATED, THE BOARD OF
DIRECTORS OF MASS GENERAL
BRIGHAM INCORPORATED, THE
INVESTMENT COMMITTEE OF MASS
GENERAL BRIGHAM INCORPORATED
and JOHN DOES 1-30.

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs, Mark Norton, Dashka Louis, Caroline Mitchell, Nancy Bartlett, and Azilda Cordahi, (“Plaintiffs”), participants in the Consolidated 403(b) Program of Mass General Brigham and Member Organizations (the “Plan”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement (“Settlement Agreement”), fully executed on April 17, 2025, and previously filed with the Court on April 17, 2025 (ECF No. 122-1);

2. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain

additional information; and

3. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

1. Memorandum of Law in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement; and

2. Declarations of Plaintiffs' Counsel, Plaintiffs, and Settlement/Notice Administrator.

Attached hereto is the proposed Final Approval Order and Judgment in the form agreed to by the Parties.

Dated: July 18, 2025

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh
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*Attorneys for Plaintiffs, the Plan
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2025, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.